

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO: Ethicon Wave 1 cases listed in Exhibit A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF DENISE ELSER, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Denise Elser, M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and instructions for use ("IFU"); (2) the design and materials of Defendants' transvaginal mesh products at issue, including the safety and efficacy of those devices; and (3) her statements about the safety and efficacy of Defendants' products based on her own practice. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum, and also the following Exhibits:

1. A list of each case to which this motion ostensibly applies, identified by case style and number, attached as Exhibit A;
2. General TVT & TVT-O Expert Report of Denise M. Elser, M.D., attached as Exhibit B;
3. Excerpts from the deposition of Denise Elser, M.D., taken September 16, 2014, attached as Exhibit C;
4. Excerpts from the deposition of Denise Elser, M.D., taken November 5, 2015, attached as Exhibit D;

5. Excerpts from the deposition of Denise Elser, M.D., taken March 30, 2016, attached as Exhibit E;
6. Excerpts from the deposition of Denise Elser, M.D., taken April 24, 2014, attached as Exhibit F;
7. Excerpts from the deposition of Charlotte Owens, taken September 13, 2012, attached as Exhibit G.

Dated: April 21, 2016

Respectfully submitted,

/s/ Thomas P. Cartmell

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 21, 2016 using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Thomas P. Cartmell

Attorney for Plaintiffs